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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 DONALD RAYMOND CROFT,
D-2 CHRISTINA ROBERTSON,
D-3 TABITHA MEECE,
D-4 SUSAN CLINTON,

Defendants.

Case: 2:13-cr-20568
Judge: Rosen, Gerald E.
MJ: Michelson, Laurie J.
Filed: 08-01-2013 At 12:26 PM
INFO USA V DONALD RAYMOND CROFT, ET
AL (EB)

VIOLATIONS: 18 U.S.C. § 2252A(a)(2)
18 U.S.C. § 2252A(a)(5)(B)
18 U.S.C. § 1465

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(18 U.S.C. § 2252A(a)(2) - *Receipt of Child Pornography*)

D-1 DONALD RAYMOND CROFT.

On or about December 14, 2009 and February 21, 2012, in the Eastern District of Michigan and elsewhere, the defendant, DONALD RAYMOND CROFT, did knowingly receive child pornography, that is, visual depictions of minors engaged in sexually explicit conduct including, but not limited to, the lascivious exhibition of the genitals or pubic area as defined in 18 U.S.C. § 2256(8); and the images received by the defendant were mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign commerce, and were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT TWO

(18 U.S.C. § 2252A(a)(5)(B) – *Possession of Child Pornography*)

D-1 DONALD RAYMOND CROFT.

On or about February 21, 2012, within the Eastern District of Michigan and elsewhere, the defendant, DONALD RAYMOND CROFT, knowingly possessed one or more computer hard drives and SD Cards which contained child pornography, as defined in Title 18, United States Code, Section 2256(8), including but not limited to visual depictions of real minors engaged in sexually explicit conduct, that has been shipped and transported using any means and facility of interstate and foreign commerce, has been shipped and/or transported in and affecting interstate and foreign commerce, and was produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT THREE

(*Production of Obscene Matters For Sale or Distribution, 18 U.S.C. § 1465, and Aiding and Abetting, 18 U.S.C. § 2*)

D-2 CHRISTINA ROBERTSON.

On or about July 7, 2009, within the Eastern District of Michigan and elsewhere, the defendant, CHRISTINA ROBERTSON, did knowingly aid and abet Donald Croft to knowingly produce with the intent to transport, distribute, and transmit in interstate commerce, for the purpose of the sale and distribution, obscene material, that is, images of Minor Victim 1, a real minor engaged in the lascivious display of her genital and pubic area, knowing such material was obscene; all in violation of Title 18, United States Code, Section 1465.

COUNT FOUR

(Production of Obscene Matters For Sale or Distribution, 18 U.S.C. § 1465, and Aiding and Abetting, 18 U.S.C. § 2)

D-3 TABITHA MEECE.

On or about July 7, 2009, within the Eastern District of Michigan and elsewhere, the defendant, TABITHA MEECE, did knowingly aid and abet Donald Croft to knowingly produce with the intent to transport, distribute, and transmit in interstate commerce, for the purpose of the sale and distribution, obscene material, that is, images of Minor Victim 2, a real minor engaged in the lascivious display of her genital and pubic area, knowing such material was obscene; all in violation of Title 18, United States Code, Section 1465.

COUNT FIVE

(Production of Obscene Matters For Sale or Distribution, 18 U.S.C. § 1465, and Aiding and Abetting, 18 U.S.C. § 2)

D-4 SUSAN CLINTON.

On or about August 20, 2009, within the Eastern District of Michigan and elsewhere, the defendant, SUSAN CLINTON, did knowingly aid and abet Donald Croft to knowingly produce with the intent to transport, distribute, and transmit in interstate commerce, for the purpose of the sale and distribution, obscene material, that is, images of Minor Victim 3, a real minor engaged in the lascivious display of her genital and pubic area, knowing such material was obscene; all in violation of Title 18, United States Code, Section 1465.

BARBARA L. MCQUADE
UNITED STATES ATTORNEY

s/Kevin Mulcahy
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Dated: August 1, 2013

United States District Court
Eastern District of Michigan

Criminal Case C

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: MAR

Case Title: USA v. DONALD CROFT, et al

County where offense occurred : Wayne

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

Indictment/ XXX Information --- no prior complaint.
D-3 TABITHA MEECE

Indictment/ XXX Information --- based upon prior complaint:
D-1 DONALD CROFT 12-30345
D-2 CHRISTINA ROBERTSON 12-30706
D-4 SUSAN CLINTON 13-30015

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 1, 2013

s/Matthew Roth

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.